

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF OKLAHOMA**

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|---|---|--------------------------------|
| HULL’S ENVIROMENTAL SERVICES, INC. |) | |
| Plaintiff, |) | |
| v. |) | Case No. 24-CIV-479-JAR |
| |) | |
| UNITED STATES OF AMERICA, ex rel. |) | |
| SECRETARY OF ARMY / U.S. ARMY |) | |
| CORPS OF ENGINEERS; et al. |) | |
| Defendants. |) | |

UNITED STATES OF AMERICA’S RULE 26 INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1)(A) and the Parties' Joint Status Report [Dkt. #52], Defendant United States of America, by and through counsel, Christopher J. Wilson, United States Attorney for the Eastern District of Oklahoma, and Michael J. O'Malley and Alexander J. Sisemore, Assistant United States Attorneys, submits the following Initial Disclosures.

At this time, the nature of the claims against the United States and the relief requested of the United States remain unclear; therefore, the necessary witnesses and exhibits the United States reasonably expects it may use to support its defenses is equally unclear. The following Disclosures are nonetheless made to the best of the United States' abilities based upon the allegations contained in Plaintiff's Complaint:

I. WITNESSES

| No. | Name | Anticipated Testimony |
|-----|--|---|
| 1 | Garrett Johnson c/o Counsel of Record | Facts and circumstances of Hull's Environmental's alleged claims against the United States; scope of work Marina Del Rey requested Hull's Environmental be performed; status of the subject lease |
| 2 | Representative(s) of Hull's Environmental, including but not limited to: | Facts and circumstances of alleged claims against the United States; Scope of work performed at subject property; actions taken/not taken by Hull's |

| | | |
|---|---|---|
| | a) David Hull | Environmental to notify the United States of Plaintiff's attempted lien on the United States' property |
| 3 | Cindy Buchanan c/o Undersigned Counsel for the United States | Current Realty Specialist for the subject lease in the Real Estate Division for the United States District Engineer, Tulsa District, Corps of Engineers; facts and circumstances of Plaintiffs' alleged claims; status of the subject lease |
| 4 | All witnesses necessary to authenticate the United States' exhibits | Authentication |

The United States reserves the right to supplement this list of witnesses as discovery progresses and the specific nature and bases of Plaintiff's alleged claim is determined. By identifying a witness above, Defendant United States does not waive any right to object to the calling of the witness by any other party at trial or any hearing in this matter or the right to object to the substance of the witness's testimony; all such objections are expressly reserved by Defendant United States.

II. EXHIBITS

| No. | Name/Title/Description |
|------------|---|
| 1 | Lease No. DACW56-1-12-080 |
| 2 | Assignment of Lease for Lease No. DACW56-1-12-080, effective January 8, 2016 |
| 3 | Supplemental Agreement No. 1 between The Secretary of the Army and Marina Del Rey, LLC for Lease No. DACW56-1-12-080, effective January 8, 2016. |
| 4 | Supplemental Agreement No. 2 between The Secretary of the Army and Marina Del Rey, LLC for Lease No. DACW56-1-12-080, effective May 25, 2017 |
| 5 | Supplemental Agreement No. 3 between The Secretary of the Army and Marina Del Rey, LLC for Lease No. DACW56-1-12-080, executed by the Secretary of the Army and Marina Del Rey, LLC on September 26, 2019, and September 11, 2019, respectively |

The United States reserves the right to supplement this list of exhibits as discovery progresses and the specific nature and bases of Plaintiff's alleged claim is determined. By identifying an exhibit above, Defendant United States does not waive any right to object to the introduction of such exhibit by any other party at trial or any hearing in this matter; all such objections are expressly reserved by Defendant United States.

III. COMPUTATION OF DAMAGES

Not Applicable.

IV. APPLICABLE INSURANCE

Not Applicable.

Respectfully submitted,

CHRISTOPHER J. WILSON
United States Attorney

/s/ Alexander J. Sisemore
MICHAEL J. O'MALLEY, OBA #22252
ALEXANDER SISEMORE, OBA #31225
Assistant United States Attorneys
520 Denison Avenue
Muskogee, OK 74401
Phone: 918-684-5176
Fax: 918-684-5130
Email: Michael.O'Malley@usdoj.gov
Email: Alexander.Sisemore@usdoj.gov

CERTIFICATE OF MAILING

I hereby certify that on June 30, 2025, I electronically filed the foregoing, using the CM/ECF system for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Mike Mordy
Carrie Pfrehm

Bradley Wilson
Conner Dunn
Douglas Elliott
Patrick Madden
Stephen Melendi
Michael Linscott
Emily Williams
Michael Goldman
Austin Evans
Matthew Felty
Joshua K. Hefner
Benjamin Barmore

/s/ Alexander J. Sisemore
Assistant United States Attorney